

LEE, LILY

From: Brasaemle, Karla <Karla.Brasaemle@TechLawInc.com>
Sent: Monday, March 5, 2018 3:54 PM
To: LEE, LILY
Subject: Summary of Major issues in ORAU Report - Comments on Draft Work Plan for HPNS

Hi Lily,

Significant observations:

The ORAU General comment indicates that there are technical issues "that prevent the plan from forming a cogent approach between the planning and assessment phases."

ORAU has similar concerns about limiting the radionuclides, using a gamma scan investigation level established at 3 standard deviations above the mean of the gamma data set being evaluated, the number of samples in a survey unit, and not scanning Group 2b sites.

They are concerned about calculation of the MDC Rates and MDC scan. (Jana and Donna should look at this one; will forward to Jana, included in my list for Donna).

ORAU had a new concern about plotting gamma scan data. Apparently there are numerous issues with doing this.

ORAU had a new concern about splitting samples. They recommend that the same sample be analyzed by both labs. (Makes sense).

ORAU had a new concern about assumptions associated with doing judgmental gamma statics.

ORAU had a new concern about using Sr-90 for calibrating instruments. They recommend using Cs-137.

Karla Brasaemle, P.G.,
TechLaw, Inc.
415-762-0566